

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

DANIEL HOUDE,	)	
Plaintiff	)	
	)	
v.	)	
	)	
ROBERT TURGEON, STEPHEN	)	
GUNNERSON, KEVIN JOHANSON,	)	
MATTHEW D'ANDREA, BRIAN	)	
HALLORAN and THOMAS C. DUFFY	)	C.A. NO. 05-40075FDS
Defendants	)	

**DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS**

1. Have you, or any member of your family or a close friend ever been a plaintiff in a lawsuit? If so, what was the nature and outcome of that lawsuit?

2. Have you, or any member of your family or a close friend ever brought a claim against, or been a plaintiff in a lawsuit against, a town or city government, such as the City of Worcester? If so, what was the nature and outcome of that claim or lawsuit, and does it consequently affect your ability to remain objective toward town or city governments in general or the City of Worcester in particular?

3. Have you, or any member of your family or a close friend ever been a juror in a case involving a town or city government such as the City of Worcester? If so, what was the nature and the outcome of that lawsuit, and does it consequently

affect your ability to remain objective toward town or city governments in general or the City of Worcester in particular?

4. Have you, or has any member of your family or a close friend ever been involved in a claim or lawsuit involving a town or city police department or police officer, including those of the City of Worcester? If so, what was the nature and the outcome of the claim or lawsuit, and does it consequently affect your ability to remain objective toward any town or city police department or police employees, including those of the City of Worcester?

5. Have you, or has any member of your family or a close friend ever been involved with any incident that you believed was not properly handled or investigated or responded to due to the fault of the police department or police officers of any town or city, including the City of Worcester? If so, does it consequently affect your ability to remain objective toward police departments or police officers of any town or city, including the City of Worcester?

6. Have you, or has any member of your family or a close friend ever been arrested?

7. Have you, or has any member of your family or a close friend ever alleged that you/they have been a victim of civil rights violations?

8. Have you, or has any member of your family or a close friend read or heard about this case in newspapers, radio, television or other media source?

9. Do you feel, for any reason, that you cannot sit as an impartial juror because this case involves the actions of police officers?

ROBERT TURGEON,  
STEPHEN GUNNERSON,  
KEVIN JOHANSON,  
MATTHEW D'ANDREA,  
BRIAN HALLORAN and  
THOMAS C. DUFFY

By their attorneys,  
David M. Moore  
City Solicitor

/s/ Janet J. McGuiggan  
Janet J. McGuiggan (BBO#630013)  
Assistant City Solicitor  
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455 Main Street  
Worcester, MA 01608  
(508) 799-1161

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I served upon Plaintiff Defendants' Proposed Voir Dire Questions via email through the Court's electronic filing system (ECF) to all registered participants on this 23rd day of January, 2008.

/s/ Janet J. McGuiggan  
Janet J. McGuiggan  
Assistant City Solicitor